

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BOY SCOUTS OF AMERICA AND DELAWARE BSA,
LLC,¹

Debtors.

OFFICIAL TORT CLAIMANTS' COMMITTEE OF
BOY SCOUTS OF AMERICA and DELAWARE BSA,
LLC,

Plaintiffs,

-against-

BOY SCOUTS OF AMERICA and DELAWARE BSA,
LLC,

Defendants.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

Adv. Pro. No. 21-50032 (LSS)

CERTIFICATION OF COUNSEL REGARDING PROPOSED SCHEDULING ORDER

The undersigned hereby certifies that:

1. On January 8, 2021, the official committee of tort claimants (consisting of survivors of childhood sexual abuse) (the “Tort Claimants’ Committee” or the “Plaintiff”), of the above-captioned debtors and debtors in possession (collectively, the “Debtors” or the “Defendants”), filed the *Complaint for Declaratory Judgment* (the “Complaint”) [Docket No. 1].

2. The deadline to answer, move, or otherwise respond to the Complaint was March 3, 2021 (the “Response Deadline”). The Response Deadline was extended to April 2, 2021 [Docket No. 5], April 16, 2021 [Docket No. 10], and April 23, 2021 [Docket No. 13].

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: Boy Scouts of America (“BSA”) (6300) and Delaware BSA, LLC (“Delaware BSA”) (4311). The Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

3. On April 23, 2021, the Debtors filed the *Debtors' Answer to the Tort Claimants' Committee's Complaint for Declaratory Judgment* [Docket No. 16].

4. On April 23, 2021, JPMorgan Chase Bank, National Association ("JPM") filed the *Motion to Intervene of JPMorgan Chase Bank, National Association* [Docket No. 15].

5. A pretrial conference has been scheduled for this matter on May 19, 2021 at 10:00 a.m. Eastern Time (the "Hearing").

6. Pursuant to L.R. 7016-1(d), Plaintiff submits the proposed *Scheduling Order* (the "Proposed Order") attached hereto as **Exhibit A**.

7. The Proposed Order has been circulated to the Debtors, JPM, and the Official Committee of Unsecured Creditors (the "Creditors Committee"), as intervening plaintiffs. These parties have not agreed to the Proposed Order.

8. Accordingly, the Plaintiff will present the Proposed Order at the Hearing.

Dated: May 14, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

James I. Stang (CA Bar No. 94435)
Robert B. Orgel (CA Bar No. 10187)
James E. O'Neill (DE Bar No. 4042)
John W. Lucas (CA Bar No. 271038)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: jstang@pszjlaw.com
rorgel@pszjlaw.com
joneill@pszjlaw.com
jlucas@pszjlaw.com

*Counsel for the Official Tort Claimants' Committee of Boy
Scouts of America and Delaware BSA, LLC*